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2 Including Professional Corporations
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12 Attorneys for Defendant
KAISER FOUNDATION HEALTH PLAN, INC.

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

16 GRACE SMITH and RUSSELL
17 RAWLINGS, on behalf of themselves and
all others similarly situated, and
18 CALIFORNIA FOUNDATION FOR
INDEPENDENT LIVING CENTERS, a
California nonprofit corporation,

19 Plaintiffs,

20 v.

21 MARY WATANABE, in her capacity as
22 Director of the California Department of
Managed Health Care; CALIFORNIA
23 DEPARTMENT OF MANAGED
HEALTH CARE; and KAISER
24 FOUNDATION HEALTH PLAN, INC.,

25 Defendants.

Case No. 4:21-cv-07872-HSG

**DEFENDANT KAISER FOUNDATION
HEALTH PLAN, INC.'S NOTICE OF
MOTION AND MOTION TO
COMPEL INDIVIDUAL
ARBITRATION AND STAY
PROCEEDINGS**

Date: April 28, 2022
Time: 2:00 p.m.
Room: 2
Judge: Hon. Haywood S. Gilliam, Jr.

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1 Dated: February 4, 2022
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4 By

/s/ A. Alexander Kuljis

5 MOE KESHAVARZI
6 JOHN T. BROOKS
7 A. ALEXANDER KULJIS

8 Attorneys for Defendant
9 KAISER FOUNDATION HEALTH PLAN, INC.
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